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2007-319-W

March 13, 2008

CERTIFIED MAIL 91 7108 2133 3933 7187 0017
RETURN RECEIPT REQUESTED

May River Water Company, Inc.
Tom Smith
621 Stephenson Avenue
Savannah, GA 31405

Re: **Warning Letter**
May River Water Company, Inc.
May River Plantation
Public Water System No. # 0750005
Beaufort County

Dear Mr. Smith:

RECEIVED

APR 18 2008

PSC SC
MAIL / DMS

RECEIVED

APR 14 2008

ORS
T,T,W,W/W

May River Water Company, Inc. (Respondent) owns and is responsible for the proper operation and maintenance of the public water system No. 0750005 (PWS) that serves the customers of the May River Plantation located in Beaufort County, South Carolina.

On October 25, 2007, Department staff conducted a Sanitary Survey of the PWS which resulted in an "Unsatisfactory" rating due to the following deficiencies: the procedures manual, monitoring records and the emergency plan were not available for Department review; and the flow meter needed to be calibrated.

As of the date of this letter, the Respondent has submitted the required paperwork and submitted documentation as to the calibration of the flow meter. The Respondent has also installed a security fence around the tank at the Site.

After careful consideration of all relevant information, the Department has determined that this warning letter would be appropriate regarding the violations of the State Primary Drinking Water Regulations, 24A S.C. Code Ann. Regs. 61-58.7 (Supp. 2007), and the State Safe Drinking Water Act.

Please be advised that any future violations of the State Primary Drinking Water Regulations, and the State Safe Drinking Water Act may result in further enforcement actions, including the assessment of civil penalties. If you have any questions regarding this notice, please contact me at (803) 898-4271.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Ramos', written over the word 'Sincerely,'.

Karen L. Ramos, Manager
Drinking Water Enforcement Section
Drinking Water Protection Division
Bureau of Water

Cc: Ken Wilson, Region 8 Beaufort EQC office

Bureau of Water

Site Name: MAY RIVER PLANTATION

System Number: 0750005

Fax Number: NONE

(A)dd, (M)odify, (R)enum, (D)etele: MIReason: 55Today's Date: 10/25/07

DW Mailing Address:

Owner: MAY RIVER PLANTATION
Attn: DON SMITH, SOUTH ATLANTICE UTILITIES
PO BOX 14111
SAVANNAH, GA 31416

Owner Business Telephone: (912)354-6296

Owner Emergency Telephone: (912)897-9729

Site Info Address:

DON SMITH
HWY 46 APPROX 4 MI W OF
BLUFTON,

* Relation Contact: None

*Phone:

DW Mail Attention: DON SMITH

DW Contact Telephone: NONE

System Characteristics

System Type: C	Inact Code:	Service Area: R1	Season On (mo/day): 01/01
Subtype:	Inact Date (mo/yr):	Counties Served:	Season Off (mo/day): 12/31
Owner Type: PRIV	Begin Date (mo/yr): 08/1976	07	

Statistical Information

Source Use Information:

Percent Surface Water 0
Percent Ground Water 100
Percent Purchased Surface Water 0
Percent Purchased Ground Water 0

Total must equal 100%

Number of Surface Water Sources 0
Number of Ground Water Sources 1
Purchased Surface Water Sources 0
Number of Permanent SW Sources 0
Number of Emergency SW Sources 0
Number of Permanent GW Sources 1
Number of Emergency GW Sources 0

Service Population:

Population 68
Secondary Population 0

Number of Service Connections:

Residential	27	Total 27
Non Residential	0	
Maximum Allowable	49	
Permitted	0	

Production (MGD):

Average 0.0092
Maximum Day 0.0185

Capacity:

Total072
Emergency 0.0000

Storage:

Elevated (MG) 0.000
Ground (MG) 0.000
Pressure (TG) 5.000

Comments

* Add/change contact name, address and phone info here.

Signature: Ken Wilson

Bureau of Water

Site Name: MAY RIVER PLANTATION

System Number: 0750005

Source ID: G07163

(A)dd, (M)odify, (R)enum, (D)elele: (M)Reason: 35Today's Date: 10/25/07

General Information

Location: AT FRONT OF PLANTN

Source Name: WELL ONE

Receiving Plant: NONE

Plant ID: NONE

Availability Code: P

Latitude: 32.23126980

Longitude: - 80.92339830

Source Code: G

Ground Water Source Information

Well Characteristics

Depth (ft): 220

Type: 4

Casing Diameter (in): 6

Casing Type: S

Under the Direct Influence of SW?: N

Well Pump Characteristics

Horsepower: 5.00

Type: S

Design Yield (gpm): 75.00

Test Yield (gpm): 0.00

Avg. Daily Production (TGD): 9.20

Regulated Capacity (TGD): 72.00

Treatment Codes

N0000

Comments

Signature: Ken Wilson

Public Water System Sanitary Survey Report
Ground Water Systems

Site name: MAY RIVER PLANTATION

System number: 0750005

Last Survey: 10/30/2006

Survey Date: 012507

SOURCE:

1. Quantity S
 2. Protection from Contam. S
 3. Security S
 4. Wellhead Piping *NU*
 5. Pumps S
 6. Flow Measuring Device I

WATER TREATMENT:

7. Filtration* N
 8. Equipment Maintenance* N
 9. Chemical Storage & Hand.* N
 10. Chemical Feed* N
 11. Chemical Injection Points* N

DISTRIBUTION:

12. Water Quality S
 13. Operation & Control S
 14. Adequate Pressure S
 15. Fire Flow N
 16. Cross Connection Control *NI*
 17. Valve/Hydrant Maintenance *NI*
 18. Flushing Program *NI*
 19. Leak Detection and Repair *NI*
 20. System Map *NI*
 21. Sample Siting Plan *NI*
 22. Disinfectant Residual* N

STORAGE:

23. Capacity S
 24. Sanitary Protection S
 25. Security *NU*
 26. Appurtenances S
 27. Maintenance *NS*

OPERATIONAL CONTROL:

28. Certified Operator/Staffing* *NS*
 29. Testing Equipment* N
 30. Monitoring/Records *NU*

GENERAL O & M:

31. Plant Security* N
 32. Facility Maintenance S
 33. Supplies/Spare Parts Inv. *NS*
 34. Waste Disposal* N
 35. Procedures Manual U

EMERGENCY OPERATION:

36. Stand-by Power N
 37. Emergency Plan U
 38. Drought Response Plan** N

CONSUMER CONFIDENCE REPORTS:

39. CCR (Y/N) Y
 A. System Group (I - V) I
 B. Operator Grade
 A. *0*
 B. *0*
 C. *0*
 D. *0*
 T. *0*

- C. Dist. Group (I - V) I

D. Distribution Operator Grade

- A. *0*
 B. *0*
 C. *0*
 D. *0*
 T. *1*
 G. *0*

E. Field Tests

- Chlorine
 pH
 psi
 Other
 Other

S. Samples Taken

- Bacteriological
 Inorganic
 Organic
 Radiological
 Other

F. Type Inspection/Visit GW ROUTINE

- G. Are all services metered? Y
 Percent metered 100%

- H. Is system presently under order? *NY*
 If Yes, is system complying w/order? N

- I. Follow up scheduled? *NY*
 Date scheduled.

- J. Overall Rating U

- K. Operator/Owner present? Y

*Applicable for treated systems only.

**Applicable for part 1 and 2 systems only.

This form represents neither a final approval of the water system, nor an approval to operate the system.

Site name: MAY RIVER PLANTATION

System number: 0750005

Last Survey: 10/30/2006

Survey Date: 10/25/07

Comments

Ken Wilson
DHEC Representative

Don Smith
System Representative

Title

**MAY RIVER PLANTATION
WATER SYSTEM
DHEC SYSTEM NO. 0750005**

SCDHEC personnel conducted a sanitary survey of your public water system on October 25, 2007. The cooperation and assistance that Mr. Don Smith provided is appreciated. The May River Plantation system consists of a single (6) inch well, a (5.0 horsepower 75 g.p.m.) submersible pump, (5,000) gallon pneumatic storage tank, with distribution system. The system serves (27) residential taps and a calculated population of (68) persons. Severn Trent Services continues to conduct the analysis of the bacteriological monitoring samples. The system water is untreated.

The purpose of the sanitary survey is to document system compliance with or to bring the system into compliance with the South Carolina Primary Drinking Water Regulations (R.61-58). For your review of compliance requirements the State Primary Drinking Water Regulations are available at (www.scdhec.gov/environment/water/regs/r.61-58/61-58.doc).

The May River Plantation sanitary survey of October 12, 2004 was evaluated, needs improvement and items were listed that required attention. The May River Plantation System was referred, primarily to obtain compliance with the certified distribution system operator requirement. The sanitary survey of October 2005 was evaluated, needs improvement. Again the 2005 sanitary survey documented the absence of a certified distribution system operator and other issues that must be addressed. The sanitary survey of 2006 was evaluated as unsatisfactory and the system was referred for formal enforcement action. The Enforcement Conference was held on January 25, 2007. In response to the conference, Mr. Tony D'Aguillo, Manager South Atlantic Utilities sent a letter to the Region 8 Office/ Penny Cornett dated March 14, 2007. The letter attachment included a map of the May River Plantation system, a drawing of the wellhead and storage tank and the Policies and Procedures Manual for the Water Utility Management Inc. Ms. Cornett's response letter of March 27, 2007 indicates that Mr. D'Aguillo's submittal was incomplete and an informational package was enclosed to assist with the preparation of required documents.

The October 25, 2007 sanitary survey of the May River Plantation system has been given an unsatisfactory evaluation and your system will be referred for enforcement action. The following items must be addressed.

1.) Wellhead Piping, Storage Security and Monitoring Records

R.61-58.7(D)(1)

D. Groundwater Sources and Treatment Plants.

(1) All wellheads and associated piping shall be inspected at a minimum of once a week. Stand-by wells shall be inspected and exercised at least quarterly. Documentation of these inspections must be maintained.

R.61-58.7.E(2)

All elevated, hydropneumatic and ground storage tanks shall be inspected at a minimum of once a week for the purpose of checking on the security of the tank(s) and insuring that proper air/water ratios are being maintained in hydropneumatic storage tanks. Vent screens, hatches and other openings on atmospheric tanks must be inspected annually to ensure sanitary protection.

The weekly wellhead piping and storage tank inspections must be documented. The inspection documentation must be made available during the sanitary survey.

2.) Flow Measuring Device and Hour Meter

61-58.7. D(7)

A flow meter shall be maintained for each well serving a community water system and each well that is equipped with chemical treatment. The meter shall be periodically calibrated to ensure accuracy in accordance with the manufacturer's recommendations. Calibration records shall be kept on file for a minimum of three (3) years.

R.61-58.2.B(16)(viii)

(viii) An hour meter shall be provided to record the elapsed run time of each well pump, which is required to have a flow meter.

The flow meter must be calibrated every three years and documentation must be maintained. All (C) or community systems are required to have a flow meter and a hour meter.

3.) Distribution and Procedures Manual

R.61-58.7 OPERATION AND MAINTENANCE

A. Applicability.

This regulation applies to all public water systems, no matter when constructed, and establishes minimum requirements for the operation and maintenance of the system in order to ensure the delivery of safe, potable water to the public. Existing systems may be required to upgrade to comply with regulations 61-58.2, 58.3, or 58.4:

- (1) when no construction permit exists, or;
- (2) when required by the Department as the result of a sanitary survey.

B. General Requirements for Operation and Maintenance of Public Water Systems.

- (1) All water systems must be operated and maintained in accordance with their construction and operating permit(s) and any approved modifications.

(2) Each system shall have and maintain up-to-date written Standard Operating Procedures for the operation and maintenance of its system. These procedures shall include but not be limited to:

- (a) detailed instructions for the operation of all major components of the water system, including wells and/or intakes, pumps, chemical feed equipment, etc.
- (b) detailed instructions on starting and stopping any treatment plant;
- (c) preventive maintenance schedules on equipment;
- (d) reporting and public notification requirements;
- (e) water quality monitoring, including frequency of monitoring and sampling and analytical procedures for any monitoring conducted by the water system;
- (f) sample siting plans;
- (g) disinfection requirements for the new construction of, or the repair of, wells, tanks and water lines;
- (h) valve and fire hydrant maintenance;
- (i) distribution system flushing program;
- (j) leak detection and repair program;
- (k) cross connection control program; and,
- (l) safety procedures.

During the sanitary survey and following, some documentation was provided on valve exercising and system flushing. The provided sample siting plan does not conform to the requirements of the South Carolina Drinking Water Regulations. Reportedly all of the customer consumption flow meters are equipped with cross connection control devices. The cross connection control program must address irrigation systems.

A procedures manual example and assistance information has been provided numerous times.

4.) Emergency Plan

B. Emergency Preparedness Plan.

- (1) Each public water system shall maintain an up-to-date copy of the Emergency Preparedness Plan at a location that is readily accessible in the event of an emergency.
- (2) Each public water system shall conduct an assessment outlining the critical parts of the water system, i.e., raw water, treatment, storage, power sources.
- (3) Each community water system shall develop an Emergency Preparedness Plan which shall, as a minimum, contain the following:
 - (a) the telephone number of the Department's District Office, the Department's drinking water program office and the Department's twenty-four (24) hour telephone number;
 - (b) the name and telephone number of:
 - (i) the County Emergency Preparedness Representative;
 - (ii) the local law enforcement and highway patrol offices; and,
 - (iii) the local fire department(s) and Emergency Medical Service (EMS);
 - (c) the telephone number of the State Emergency Preparedness Office;
 - (d) the names and telephone numbers of the water system's personnel who should be notified in the event of an emergency;
 - (e) the locations and telephone numbers of primary and secondary command posts that may be utilized in the event of emergency;
 - (f) the names and telephone numbers of current chemical suppliers;
 - (g) the names and telephone numbers of the electric power, natural gas, telephone and cable companies, and if available, the locator service in the area;
 - (h) the names and telephone numbers of critical users and the priority of service to each one, i.e., dialysis patients, hospitals, etc.;

- (i) the names and telephone numbers of potential sources of spare parts, pipe sections, repair clamps;
- (j) the names, addresses and telephone numbers of equipment suppliers and contacts for equipment repair, i.e. rewinding of motors, pump shaft repairs;
- (k) a list of any mutual aid agreements among water systems, such as emergency connections, personnel, equipment and chemical supplies;
- (l) the names, addresses and telephone numbers of contractors to call for making any repairs beyond the capability of the systems personnel;
- (m) the names and telephone numbers of well drillers (if applicable);
- (n) the names and telephone numbers of other sources of assistance such as engineers, laboratories;
- (o) arrangements for obtaining emergency power;
- (p) arrangements for obtaining potable water;
- (q) an up-to-date distribution map showing line sizes and the location of all valves, fire hydrants, blow-offs and pumping, storage and treatment facilities. If the map is too large to include in the plan, the plan must reference its location;
- (r) notification procedures to the public and media and example notices to be issued, such as notices instructing customers to boil their water prior to consumption; and,
- (s) emergency disinfection procedures for wells (if applicable), water lines and storage tanks;

The form "EMERGENCY PROCEDURES FOR SMALL COMMUNITY WATER SYSTEMS" was provided previously. A copy of the emergency procedures form is to be posted in the well house.

5.) Under the Direct Influence of Surface Water

The well in your system is not considered to be under the direct influence of surface water, based on current information. However, changing circumstances

may change the results of future evaluations.

6.) Other

In accordance with the State Primary Drinking Water Regulations, R.61- 58.6 D, you must retain a copy of the sanitary survey report for a period not less than ten (10) years and make it available for inspection by the Department and the public upon request.